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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GERALD ARMSTRONG,

CV-N-97-00670-HDM (RAM)

Plaintiff,

vs.

COMPLAINT FOR LIBEL
AND DEFAMATION, AND
FOR OTHER RELIEF

DAVID MISCAVIGE and CATHY
NORMAN, individuals; CHURCH
OF SCIENTOLOGY INTERNATIONAL,
a California corporation; the
RELIGIOUS TECHNOLOGY CENTER,
a California corporation; the
SEA ORGANIZATION, a California
based unincorporated entity;
and the CHURCH OF SCIENTOLOGY
OF TEXAS, a Texas corporation;

JURY DEMAND

Defendants.

CLERK
DEPUTY

LANCE S. WILSON
CLERK

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FILED

Plaintiff, Gerald Armstrong, alleges as follows:

JURISDICTION AND VENUE

1. Subject matter jurisdiction resides in this Court pursuant to 28 U.S.C.A. § 1332, as plaintiff is a resident of Nevada, and defendants are residents of California or of Texas.

2. The amount in controversy exceeds Seventy-five Thousand Dollars (\$75,000), exclusive of interest and costs.

3. Venue is laid in this United States District Court (Northern Division) for the District of Nevada pursuant to 28 USCA § 1391 (a) and pursuant to Local Rule 1002 (b) (1-2).

NATURE OF THE ACTION

4. Plaintiff, as claims for relief, alleges entitlement to damages caused by defendants' malicious publication and dissemination of false and defamatory statements, as well as claiming damages for defendants' intentional infliction of emotional distress upon him.

PARTIES

5. Plaintiff Gerald Armstrong ("GA", "Armstrong") a resident of Nevada at the time of filing this complaint, from 1969 through 1981 was a devoted and trusted Scientologist. From 1971 through 1981 he was a member of the Sea Organization, the highly dedicated upper echelon and management arm of Scientology. For significant portions of that period he dealt directly with Scientology founder L. Ron Hubbard and became intimately familiar with organization policies and practices. Armstrong's last assignment was to maintain and make available to Hubbard's biographer the most personal and revealing Hubbard boyhood-forward lifetime documents. It was in this period that Armstrong discovered the dark side of Scientology's founder, ultimately leading Armstrong to leave the organization.

6. Defendant Church of Scientology International ("CSI") and defendant Religious Technology Center ("RTC") both California corporations, as recently as October 29, 1997 have been found by the California Superior Court of Los Angeles County to be two of

the alter ego firm control entities of the full Scientology operations.

7. Defendant Sea Organization ("Sea Org"), an unincorporated California-based entity or association housed in the various business offices of that state's corporate party defendants herein, is the third of the alter ego entities which control Scientology throughout the world.

8. Defendant David Miscavige ("DM", "Miscavige") is the individual who is the present RTC chairman and the highest ranking member of the Sea Org. The Sea Org, on information and belief and upon proofs to be adduced in these proceedings, is "the absolute power center" of the whole "Scientology" establishment said to be located worldwide, including 150 satellite or affiliated entities claimed to exist in the United States. Miscavige sits alone and highest at the very center of "the absolute power center," controlling absolutely by whatever traditional Scientology/Hubbard/Miscavige means are required.

9. Defendant Church of Scientology of Texas ("CST") is a Texas corporation, under the domination and control of, the California defendants herein.

10. Defendant Cathy Norman ("Norman") is an employee of CST, and responsible to, receiving orders from, and under the domination and control of, the California defendants herein.

GENERAL ALLEGATIONS

11. Plaintiff does repeat, reallege, adopt, and incorporate by reference as though set out in haec verba herein, each allegation contained in paragraphs 1 through 10 hereinabove.

12. In 1981 Armstrong became disillusioned because his duties led him to archived papers disclosing critical personal frauds and organization deceptions perpetrated by other Hubbard intimates and by Hubbard himself during his years heading up Scientology. During his archiving activities Armstrong observed that over Hubbard's adult life he used a philosophy of "opportunistic hatred" and the "acts which flow therefrom (lying, cheating, stealing, compromising, entrapping, obstructing, bullying, blackmailing, destroying) as the solution to his problems."

13. In the 1960's Hubbard established this philosophy and practice as policy for the Scientology organization's treatment of people designated as "enemies," and dubbed this policy "fair game." The fair game policy states that "enemies" "may be deprived of property, injured by any means by any Scientologist...may be tricked, sued, or lied to or destroyed."

14. One of Scientology's mechanisms for implementation of fair game against a designated "enemy" is a policy and practice of character assassination, which Hubbard termed "black propaganda" or "black PR." The stated purpose of black PR is to destroy an "enemy's" reputation and credibility or public belief in him by the manufacture and spreading of falsehoods about him.

15. Fair game has been judicially condemned many times. In a landmark California proceeding, Los Angeles Superior Court Judge Paul G. Breckenridge, Jr. in his decision rendered in 1984 in the case of Scientology v. Gerald Armstrong, Case No. C420153. Judge Breckenridge stated in a now haunting declaration:

"In addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the Church whom it has perceived as enemies. The Organization clearly is schizophrenic and paranoid, and this bizarre combination seems to be a reflection of it founder LRH."

16. In response to such judicial and societal condemnation of its practices, defendants have claimed over the past many years that the fair game doctrine had been "canceled", is "no longer Scientology policy" and "no longer practiced." Defendants claim that the people who were harassing and abusing others were doing so in violation of Hubbard's/organization policy, and as a result were purged from the organization. Defendant Miscavige, the present supreme director of all Scientology components, claims, in effect, that he was personally responsible "for the purge" and "for the elimination of fair game activities."

SPECIFIC ALLEGATIONS

17. Plaintiff does repeat, reallege, adopt, and incorporate by reference herein as though set out in haec verba herein, each allegation contained in paragraphs 1 through 16 hereinabove.

18. The grim truth however — and notwithstanding the repeated public Miscavige statements, as demonstrated infra — is that defendants herein have designated Armstrong an "enemy" and have from the time he left Scientology and up to the present subjected him to fair game and a massive international black PR campaign. The document which gives rise to this complaint was created and disseminated by defendant components of the Scientology enterprise pursuant to fair game, and is black propaganda.

19. Rather than deal responsibly with and actually eliminate their antisocial nature and practices as condemned by Judge Breckenridge, defendants have chosen to continue to subject designated "enemies," including Armstrong, to fair game and black PR. In their document which gives rise to this complaint, defendants seek inter alia to undermine the validity of Judge Breckenridge's decision by destroying Armstrong's reputation and credibility through the manufacture and dissemination of falsehoods about him. Clear, irrefutable proof is shown immediately hereinafter, that "fair game" and "black propaganda" are very much alive and spreading their frightening and historically contemptible poisons however, whenever, wherever, the Scientology's Miscavige-CSI-RTC-Sea Org cabal dictates.

20. Triggering this complaint: on October 21, 1996 one Cathy Norman caused transmission and publication of a one page letter on the letterhead of the Church of Scientology of Texas, Austin, to Craig Branch, Watchman Fellowship, P.O. Box 530842, Birmingham, Alabama, 35253. This letter showed a "cc: James Walker", thus broadening its publication. Copy by photocopy of the October 21, 1996 Norman-Branch letter marked Armstrong Exhibit A is annexed and incorporated herein.

21. One of the enclosures was an eight page document bearing a top line first date of 10-May-1993, followed by a court of law case name in capital letters and the date (emphasis added) June 20, 1984, viz :

CHURCH OF SCIENTOLOGY OF CALIFORNIA (PLAINTIFF)

vs.

GERALD ARMSTRONG (DEFENDANT)

June 20, 1984

22. As will presently be shown by plaintiff's allegations, the first three paragraphs of this May 10, 1993 forty-five hundred ± word critique by Miscavige-CSI-RTC-Sea Org of a June 20, 1984 decision of a State of California Superior Court Judge (Breckenridge) sent on October 21, 1996 by a Texas Scientologist loyalist (Cathy Norman) to an Alabama Watchman Fellowship adherent (Craig Branch) capsulize what this case is all about. The subject documents reached plaintiff Armstrong in Marin County, California before the month of November, 1996 was over. The first paragraph, including its "headline" (the "defendant" referred to is Gerald Armstrong, plaintiff here), reads:

"FALSEHOOD IN DECISION OF JUDGE BRECKENRIDGE:

"While defendant has asserted various theories of defense, the basic thrust of his testimony is that he did what he did because he believed that his life, physical and mental well being, as well as that of his wife were threatened because the organization was aware of what he knew about the life of LRH, the secret machinations and financial activities of the Church and his dedication to the truth."

23. The second paragraph of Armstrong Exhibit B, including "headline" reads:

"TRUE INFORMATION:

"Los Angeles Superior Court Judge Paul Breckenridge made the above statement as a part of a decision where the Church had sued Armstrong for theft of certain confidential documents from the Church. Far from any "dedication to the truth," Armstrong had boasted of his ability to lie and to forge documents."

24. The third paragraph then continues what can only be

described accurately — if fidelity to the 1970s precepts of L. Ron Hubbard himself is to be maintained — as a 1993 Miscavige-CSI-RTC-Sea Org dissemination out of California of an archetype, "fair game" implemented "Church of Scientology black propaganda document," viz:

"Gerald Armstrong is a former clerk¹ employed by Church of Scientology of California. During the later years of his tenure as an employee of the Church, Armstrong was placed in charge of a huge quantity of documents that belonged to L. Ron Hubbard that contained private and personal information regarding Mr. Hubbard. Part of his duties included research to support the work of an author who had been retained to write an authorized biography of Mr. Hubbard."

A copy of the full eight page document, marked Armstrong Exhibit B — with the 27 paragraphs each bearing an Arabic numeral (thus, 1 through 27) — is annexed and by such reference is incorporated herein.

25. The two documents, Armstrong Exhibit A and Armstrong Exhibit B, taken together, contain printed paragraphs constituting libel per se. The two documents, taken together, and as they were disseminated and mailed, constitute the malicious and defamatory statements concerning plaintiff Armstrong identified hereinafter. [Note, each "Item____" is keyed to an Armstrong Exhibit B number stamped (as in 1 through 27) on the left hand margin of Exhibit B."] Random partial highlighting of some of the twenty-seven

¹ The labeling by Miscavige CSI-RTC-Sea Org of Gerald Armstrong as "a former clerk" reveals another black PR habit of the Scientology people, that of persistently demeaning an "enemy" or adversary. The truth is that the Armstrong positions in the Sea Org actually included these: Ship's Legal Officer; Ship's Public Relations Officer, Ship's Intelligence Officer, L. Ron Hubbard's Deputy External Communications Aide, Deputy Commanding Officer of Hubbard's Household Unit, and L. Ron Hubbard Biography Researcher.

paragraphs support the initial Armstrong claims for relief.

- Item 2: "Gerry Armstrong far from being afraid for his life, was actively engaged in secret machinations his own to seize control of the Church...Armstrong has boasted at length of his ability to lie and to forge documents²."
- Item 3: "Gerald Armstrong is a former clerk..."
- Item 4: "Armstrong. . .left. . .taking with him huge numbers of confidential documents which belonged to Mr. Hubbard or his wife..."
- Item 5: "... the Church received evidence that Armstrong had stolen thousands of documents from Archives when he left the Church."
- Item 6: "Once the demand...was made, Armstrong turned the stolen documents over ..."
- Item 7: "...Church sued Armstrong for conversion, breach of fiduciary duty...and invasion of privacy based on Armstrong's theft of extensive amounts of papers owned by the Church or the Hubbards."
- Item 8: "His defense was stricken on four different occasions ³ by three different judges."
- Item 9: "Armstrong and Flynn were ordered to turn all copies of the documents that Armstrong had stolen over to the court. . ."
- Item 10: "The Church presented motions to prevent Armstrong from introducing the stolen confidential documents ...The Church was completely ambushed in the trial by these documents...the Church had no chance to

² As defendants know (or are charged with knowing) Miscavige CSI-RTC-Sea Org (or at least the latter surely know) the late L. Ron Hubbard, if it suited his purposes, unhesitatingly commanded document forgery and/or document alteration, just as he caused to be constructed — much of it still part of the Hubbard folklore — many egregiously false aspects of his own life history, accomplishments, and beliefs.

³ This defendants' statement is, simply, not true. The defense of justification, or privilege, was never stricken. The judges in pretrial phases did not permit the then defendant Armstrong to depend on the defense of "unclean hands," which would have barred then Plaintiff-Scientology from proceeding in limine.

prepare and put on that evidence before being hit with the documents in trial."

- Item 11: "...witnesses...testified...with regard to his alleged justification for stealing the documents."
- Item 13: "The Church had proven that Armstrong was guilty of stealing...Judgment, however, was entered in favor of Armstrong, essentially finding that...The only lawsuit that there was to fear was the one that was ultimately filed for return of the stolen documents."
- Item 14: "...when he committed these thefts Armstrong...was engineering a plan to infiltrate and take over the Church at the behest of the Criminal Investigation Division of the Internal Revenue Service..."
- Item 15: "...the Church obtained permission from the Los Angeles Police Department to conduct undercover surveillance of Armstrong⁴..."
- Item 17: "...his justification defense...was completely bogus..."
- Item 25: "The Court of Appeal upheld Breckenridge's decision on the legal technicality that it believed a justification defense is available to defend against theft in California."

⁴ Here, in this Exhibit B, the reader finds Miscavige-CSI-RTC-Sea Org, for whatever Scientology type purpose, not telling the whole (truthful part of the) story. In Item 15, above, the persons in charge untruthfully assert "the Church obtained permission from the Los Angeles Police Department." So too, in the Miscavige Declaration of February 8, 1994 (at page 31, lines 27-28, DM Declaration "under penalty of perjury) Mr. Miscavige swears that: "[Armstrong was proven a liar." In a police-sanctioned investigation. . . ." What this head man's patent untruth does not reveal about their "undercover agent", one Eugene M. Ingram, the opinion of no less a public figure than the Chief of Police, Los Angeles. As the annexed Armstrong Exhibit E reveals (emphasis supplied) that: the letter is believed "to have been drafted by Ingram himself" and that "The Los Angeles Police Department has not cooperated with Eugene Ingram. It will be a cold day in hell when we do."

Item 27: "The Church recently sued Armstrong for his blatant disregard of his obligations under the settlement agreement...another Superior Court Judge was not impressed and slapped Armstrong⁵ with a preliminary injunction."

26. Plaintiff, upon learning of the existence of the subject libelous materials, called their existence to the attention of his undersigned counsel in Nevada attorney George Abbott. After lengthy Armstrong-Abbott discussion, the two agreed to make demand of and afford written opportunity for publication of full retraction by Ms. Norman, as well as by defendants CSI, RTC and Miscavige.

27. Prior to making demand for retraction, plaintiff and his legal counsel had concluded that the transparently provable facts constitute clear evidence that "fair game" and black PR" has pursued Gerry Armstrong up to today -- whatever misstated history and facts Scientology's all-powerful David Miscavige has chosen to rewrite. A photocopy of the letter sent to defendant Cathy Norman, with copies to CSI, RTC and Miscavige and dated February 12, 1997 is annexed hereto as Armstrong Exhibit C, and incorporated herein.

⁵ While defendants CSI-Miscavige et al choose to exult for a moment over issuance of a preliminary restraining order, plaintiff suggests that unaccustomed Scientology candor would at this point have less triumphantly revealed the other half of this "good news, bad news" vignette, viz, Judge Sohigian, while granting a narrow part of Scientology's requested injunction also stated that:

"[Scientology] involves abusing people who are weak. . .involves techniques of coercion. . . [there is] a very, very substantial deviation between [Scientology's] conduct and standards of ordinary, courteous conduct and standards of ordinary, honest behavior. . .[when dealing with Scientology] be sure you cut the deck. . .make sure to count all the chips."

28. The only response to the Norman-CSI-RTC-Miscavige directed letters came from one attorney Andrew Wilson, whose opening statement declared that "[t]his firm represents Church of Scientology International ("CSI") in the referenced matter and has been asked to respond to your letter," and who rejected plaintiff's demand for retraction out of hand. A photocopy of the letter received from Mr. Wilson and dated February 25, 1997 is annexed hereto as Armstrong Exhibit D, and incorporated herein.

29. Plaintiff does repeat, reallege, adopt, and incorporate by reference herein as though set out in haec verba herein, each allegation contained in paragraphs 1 through 28 hereinabove.

FIRST CLAIM FOR RELIEF

30. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 1 Armstrong had stolen Scientology's and Hubbard's documents (Exhibit B, ¶¶ 5,6,7,8,9,10,11,13,14,18)
This statement by defendants concerning plaintiff is false and libel per se.

SECOND CLAIM FOR RELIEF

31. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 2 Armstrong's defense of justification in his 1984 trial because of his fear of attacks by Scientology was a total farce, completely bogus, a fraud, and a fraudulent sabotage (Exhibit B, ¶¶ 2,14,17,20)

This statement by defendants concerning plaintiff is false and libel per se.

THIRD CLAIM FOR RELIEF

32. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 3 Scientology was ambushed by Armstrong and his attorney at trial and had no chance to prepare and put on evidence (Exhibit B, ¶¶ 10,12)

This statement by defendants concerning plaintiff is false and libel per se.

FOURTH CLAIM FOR RELIEF

33. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 4 Armstrong wanted to seize control of Scientology (Exhibit B, ¶¶ 2,14,16)

This statement by defendants concerning plaintiff is false and libel per se.

FIFTH CLAIM FOR RELIEF

34. On all of the foregoing allegations and pursuant to

applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 5 Armstrong sought to recruit dissident Scientologists to overthrow the organization (Exhibit B, ¶¶ 15,16)

This statement by defendants concerning plaintiff is false and libel per se.

SIXTH CLAIM FOR RELIEF

35. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 6 The Los Angeles Police Department granted Scientology permission to conduct undercover surveillance of Armstrong (Exhibit B, ¶ 15)

This statement by defendants concerning plaintiff is false and libel per se.

SEVENTH CLAIM FOR RELIEF

36. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 7 Armstrong created a plan to plant forged and incriminating documents in Scientology files to be found in a raid by the Internal Revenue Service (Exhibit B, ¶¶ 16,19)

This statement by defendants concerning plaintiff is false and libel per se.

EIGHTH CLAIM FOR RELIEF

37. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 8 Armstrong stated that neither truth nor good faith play any significant role in litigation (Exhibit B, ¶ 21)

This statement by defendants concerning plaintiff is false and libel per se.

NINTH CLAIM FOR RELIEF

38. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 9 Armstrong stated that facts mean nothing to a civil litigant and that truth is merely an avoidable obstacle (Exhibit B, ¶ 21)

This statement by defendants concerning plaintiff is false and libel per se.

TENTH CLAIM FOR RELIEF

39. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 10 Armstrong boasted at length of his ability to lie and to forge documents (Exhibit B, ¶ 2)
This statement by defendants concerning plaintiff is false and libel per se.

ELEVENTH CLAIM FOR RELIEF

40. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 11 The evidence shows Armstrong's state of mind to be of a calculating, aggressive and dishonest character (Exhibit B, ¶ 24)
This statement by defendants concerning plaintiff is false and libel per se.

41. The above falsehoods were known by defendants to be false and were manufactured and disseminated by defendants maliciously with the intention of causing plaintiff to be mistrusted, reviled, shunned, humiliated and further attacked, and as a result of defendants' manufacture and dissemination of the above falsehoods plaintiff was mistrusted, reviled, shunned, humiliated and further attacked.

42. Separately and together, these falsehoods, supra, were calculated to cause great injury to plaintiff's reputation, credibility and character.

43. Plaintiff has always enjoyed a good reputation for honesty, truthfulness and uprightness of character. Judge Breckenridge in his 1984 decision stated regarding plaintiff that

"he did what he did, because ... [of] his dedication to the truth;" and that his "testimony [was] credible, extremely persuasive."

44. The calculated, willful, reckless, and harmful mistreatment — with resulting physical, mental, and economic damages — exemplified by the allegations of each of the foregoing eleven claims for relief, directly caused the injuries to plaintiff's person alleged in the hereinafter alleged Twelfth Claim for Relief.

TWELFTH CLAIM FOR RELIEF

(Intentional Infliction of Emotional Distress)

45. Plaintiff does repeat, reallege, adopt, and incorporate by reference as though set out in haec verba herein, each allegation contained in paragraphs 1 through 44 hereinabove.

46. Plaintiff, for a twelfth claim for relief does allege that for more than fifteen years defendant David Miscavige — individually, and in concert with a handful of societal kin, with others making up an all-powerful "Scientology" cabal — has been engaged in a relentless, never-interrupted course of conduct designed to destroy plaintiff Gerald Armstrong.

47. The methods of destruction at hand were those approved, indeed in no small part invented by the now deceased L. Ron Hubbard. Central to the chosen means were the "fair game" and "black propaganda" techniques and practices described hereinabove. Defendant Miscavige was not above indulging in false, wholly untrue, harmful and spiteful, even inhumane, statements, including even those "under penalty of perjury", as exemplified by the exposition of Miscavige sworn and unsworn public statements to

the light of truth, supra. As two examples of this defendant's willingness to be untruthful: this complaint specifically identifies DM's "sworn under penalty of perjury" declarations embracing the much-vaunted Miscavige insistence that "early on, I ended fair game, once and for all"; so too, the Miscavige flat out claim an "undercover agent" was "sanctioned" by the Los Angeles Police Department, a claim proven to be a lie. See Armstrong Exhibit E.

48. A search by plaintiff through discovery will be needed to confirm (or to deny) the many and diverse rumors afloat regarding the degree of "fair game" and "black propaganda" directed at Armstrong over the past fifteen year period, and currently.

49. Meantime plaintiff alleges unbridled misconduct — by defendant Miscavige, and/or under his control and direction, and/or within his knowledge and acquiescence at all times, all within the purview of the defendants and each of them — which conduct has been and is, designed to inflict nonstop severe and grossly damaging emotional distress.

50. (a) By means of the premises herein established, these defendants and each of them have unlawfully and maliciously caused plaintiff to become greatly vexed, harassed, and injured, have caused him to suffer great mental and nervous strain, and caused his feelings to be hurt.

(b) Defendants' misconduct has also caused plaintiff to be exposed to, and to have suffered, intended or actual public and institutional (e.g. Watchman Fellowship) hatred, contempt, and obloquy, all constituting misconduct designed to deprive him of public confidence and social intercourse in the communities in

which he has resided or where he has sojourned.

(c) The actions of defendants designed to destroy plaintiff — embracing "destruction" in all its forms, literally, physically, psychically, mentally, in his livelihood, in ordinary senses of well being, through every form of intentional infliction of emotional distress — in compensatory damages in amount upon proofs to be adduced but estimated to exceed \$900,000 from and after May 10, 1993. On said premises, and by reason of the aforesaid acts of defendants, plaintiff has sustained serious actual damages, in an amount to be proven at trial, but no less than the minimum jurisdictional amount for this Court.

TRIAL OF THIS MATTER BEFORE A JURY IS DEMANDED.

WHEREFORE, plaintiff prays for damages against all defendants, jointly and severally, as follows:

ON ALL TWELVE CLAIMS FOR RELIEF ABOVE SET OUT

1. For general damages according to proof at trial.
2. For special damages according to proof at trial.
3. For costs of suit.
4. For punitive damages; and
5. For such other relief as the Court may deem just.

Dated: Minden, Nevada
November 21, 1997,

Respectfully submitted,

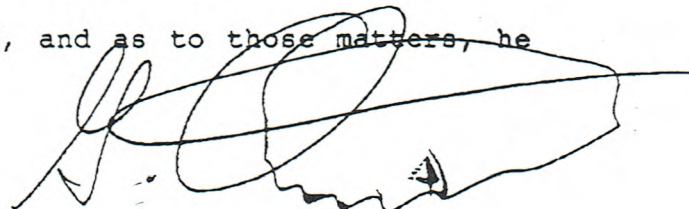
GEORGE W. ABBOTT, CHARTERED


George W. Abbott

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

GERALD ARMSTRONG, under penalty of perjury, makes the following assertions:

He is the plaintiff in the above-entitled action; that he has read the foregoing Complaint for Libel and for Defamation, and for Other Relief and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, he believes it to be true.



Gerald Armstrong

Subscribed and sworn to before
me this 21st day of November, 1997.

Mary Abbott
Notary Public

